Continental

Continental Airlines, Inc.
Systems Engineering
600 Jefferson Blvd
Houston, TX 77002

December 3, 2004

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590-001

Subject: B767 Engine Fuel Feed Tube and Front Spar Fitting Electrical Bonding Test – Proposed Rule

Reference:
A/ Rules Docket No. FAA-2004-19680
B/ Boeing Service Bulletins 767-28A0071 & 767-28A0072
C/ NPRM Docket No. 2004-NM-215-AD

Dear Sir or Madam:

In response to the ref. /A/ FAA's proposed rule, requiring the inspections of certain wire bundles in the left and right engine aft fairings for discrepancies, Continental Airlines has reviewed the ref. /C/ NPRM and related documents and the comments below are submitted for your consideration.

- The ref. /B/ bulletins have been accomplished on one of Continental Airline's B767-400 airplanes.

- The accomplishment instructions, as stated in the ref. /B/ bulletins (including the operational tests) took approximately 20 man-hours, or 10 elapsed hours per airplane.

- During the accomplishment of the work instructions, as currently stated in the ref. /B/ bulletins have revealed the following discrepancies that have prevented the accomplishment of this modification to the remaining Continental's aircraft:

- The preparation of the mating surface area on the dry bay side of the front spar for bonding requires the usage of a stainless steel rotary brush. Upon the completion of this initial clean up and due to the removal by the steel brush of excess aluminum material from the spar, the flap or shot peening of the cleaned area is required . This mating surface area preparation is almost impossible to be done for the following reasons:
    - There is a high possibility of damaging the mating surface area by the usage of a stainless steel rotary brush due to the difficulty controlling the cleaning process or the removal amount, or depth of the aluminum material.
    - The usage of a stainless steel rotary brush in the front spar area would create and introduce unwelcome contamination in the area and in the fuel tank
    - The steel rotary brush when attached to an electrical motor tool would create a fire hazard condition. The front spar area has been classified as a fuel vapor area.
    - The current flap or shot peen equipment cannot fit properly in this area due to the accessibility.
    - The current flap or shop peen tools are equipped with an electrical motor that would create a fire hazard condition. The front spar area is classified as a fuel vapor area.

- The above discrepancies have been reported to Boeing and in coordination with Continental Airline's Engineering Department the following proposed alternate rework instructions have been approved by Boeing's Engineering department:
    - The preparation of the mating surface area on the dry bay side of the front spar for bonding should be accomplished by the Cleaning Procedures 1, 2 or 3 of the Boeing Standard Wiring Practices Manual, (BSWPM), section 20-20-00. The cleaning should be accomplished by the usage of fine abrasive material, 100 grit or finer, that would remove the minimum amount of aluminum, not to exceed 0.0010 inch.
    - These alternate rework instructions were evaluated and validated during the accomplishment of the ref. /B/ bulletins on the Continental Airline's airplane. Refer to the attached figures, one through four, that show the affected areas on the front spar.

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Continental recommends that the reference /B/ service bulletins to be revised with the proposed alternate rework instructions for the above mentioned discrepancies prior to the ref. /C/ NPRM becoming a 14 CFR Part 39- Airworthiness Directive (AD). If the ref. /C/ NPRM becomes an AD with the reference in the section “Investigative and Corrective Actions” the ref. /B/ bulletins revision 1 release, then an alternate means of compliances for this AD per 14 CFR 39.19 procedures would be required for each airplane that, any of the above discrepancies are found and the alternate work instruction are applied.

Thank you for the opportunity to comment on this subject. Please feel free to contact me if you have further questions on this subject.

Sincerely,

George Zombanakis
Master Systems Engineer

Tel.: 713-324-8976
Fax: 713-324-8335
Email: gzomba@coair.com

FIGURE 1

FIGURE 2

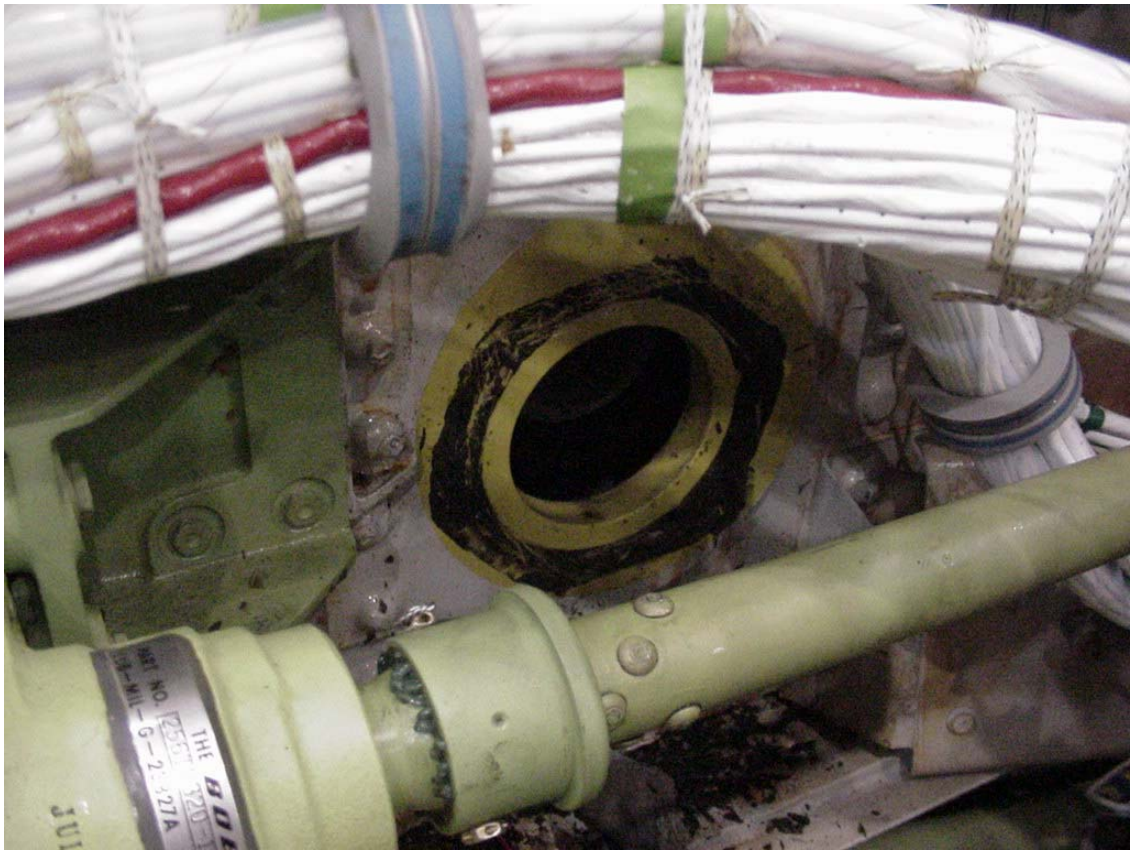

FIGURE 3

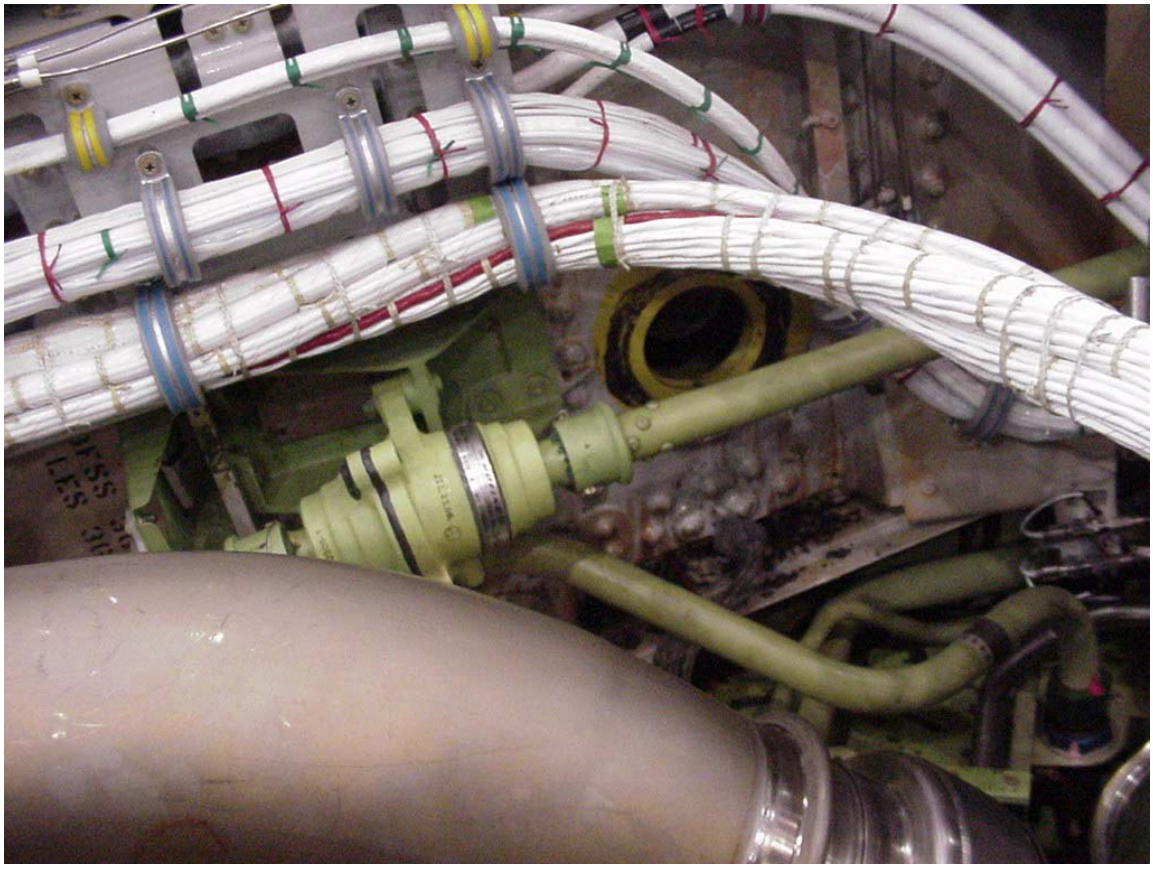

FIGURE 4